

# Exhibit 2

**KAPLAN RICE LLP**  
 142 West 57th Street, Suite 4A  
 New York, NY 10019  
 (212) 235-0300

September 12, 2020

Michael Principe  
 GSE Worldwide  
 1500 Broadway  
 New York, NY 10036

Invoice# 2972 HJK  
 Our file# 60276 0013  
 Billing through 07/31/2020

Re: Scofield Post Award Proceedings

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<u>PROFESSIONAL SERVICES</u>	<u>Hours</u>	<u>Amount</u>
Kaplan, Howard J.	20.90	\$22,990.00
Eggenberger, Michael K	3.70	\$1,665.00
Roy, Chandni	53.00	\$15,900.00
Balkoski, Katherine T	0.50	\$95.00
Hine, Rebecca	0.20	\$37.00
Irizarry, Gabriel	5.10	\$1,071.00
Total Services		<hr/> 41,758.00

Federal Express	241.47
Court Database	35.30
Court Fees	350.00
Lexis Research	11.82
Westlaw Research	1,686.93
Total Disbursements	<hr/> 2,325.52

Billing Summary

Total professional services	\$41,758.00
Total expenses incurred	\$2,325.52
Courtesy Discount	\$6,263.70 CR
Total of new charges for this invoice	\$37,819.82
[REDACTED]	[REDACTED]

KAPLAN RICE LLP  
60276 0013 GSE

Invoice# 2972 Page 2

[REDACTED]

[REDACTED]

KAPLAN RICE LLP  
60276 0013 GSE

Invoice# 2972 Page 3

Detail of Fees Billed

07/01/2020	HJK	Emails to Kaiser; telecon with [REDACTED].	1.20 hrs.	1,320.00
07/01/2020	CR	Research re [REDACTED] [REDACTED] Draft motion to confirm including research; Draft HK affidavit in support of motion to confirm.	4.40 hrs.	1,320.00
07/02/2020	CR	Revised draft motion to confirm, including additional research.	5.90 hrs.	1,770.00
07/04/2020	HJK	Draft motion to confirm.	2.00 hrs.	2,200.00
07/05/2020	HJK	Revise motion to confirm.	1.50 hrs.	1,650.00
07/06/2020	CR	Draft and revise motion to confirm. Research related to motion to confirm. Revise affidavit in support of motion to confirm. Draft petition, including research [REDACTED] [REDACTED]	2.30 hrs.	690.00
07/07/2020	CR	Revise and review draft motion. Revise petition. Draft notice of petition. Draft verification.	3.30 hrs.	990.00
07/08/2020	HJK	Revise motion to confirm.	1.30 hrs.	1,430.00
07/08/2020	CR	Draft and revised memorandum of law in support of petition to confirm, the petition to confirm, the notice of petition, and verification.	3.30 hrs.	990.00
07/09/2020	CR	Revise and organize all petition papers, including exhibits.	0.70 hrs.	210.00
07/12/2020	CR	Revised petition papers.	2.60 hrs.	780.00
07/13/2020	HJK	Final comments to papers.	2.50 hrs.	2,750.00
07/13/2020	CR	Reviewed and revised draft petition and memorandum of law and finalized for filing, including cite checks; Revised notice and researched procedure for service of petitions; Organized exhibits to petition; Correspondence [REDACTED] [REDACTED] Correspondence with process server re service of petition papers; E-mail filed petition papers to respondents' counsel.	4.60 hrs.	1,380.00
07/13/2020	GI	Assist with organizing exhibits and petition papers in preparation for filing; File petition with exhibits and RJI utilizing ECF NYSEF; Coordinate service of ECF filed petition documents.	2.50 hrs.	525.00
07/15/2020	GI	Assist with organizing stamped copies of petition papers for service of filing; File	1.10 hrs.	231.00

KAPLAN RICE LLP  
60276 0013 GSE

Invoice# 2972 Page 4

		amended notice of motion utilizing ECF NYSEF; Coordinate service of ECF filed motions papers documents.		
07/24/2020	CR	Reviewed notice of removal.	0.60 hrs.	180.00
07/25/2020	HJK	Review removal petition.	1.50 hrs.	1,650.00
07/27/2020	GI	Review docket for all recent updates and filings.	0.30 hrs.	63.00
07/27/2020	HJK	Review Scoffield removal; emails re: research.	1.00 hrs.	1,100.00
07/27/2020	CR	Research of LMRA section 301 and other rules cited in notice of removal for preemption basis.	7.10 hrs.	2,130.00
07/28/2020	GI	Review docket and download all recent filings.	0.30 hrs.	63.00
07/28/2020	HJK	████████████████████; letter re: default; review 301 research; telecon with CR; emails re: reply.	2.50 hrs.	2,750.00
07/28/2020	CR	Draft letter to Kaiser; Review transcripts to ████████████████████ Research and draft segments of reply brief.	3.50 hrs.	1,050.00
07/29/2020	GI	Review docket and download decision & order.	0.20 hrs.	42.00
07/29/2020	RH	Saving NYSCEF docket to W drive.	0.20 hrs.	37.00
07/29/2020	HJK	Telecons with CR; letter to Kaiser; review cross petition to outline reply.	2.30 hrs.	2,530.00
07/29/2020	CR	Research, outline and draft segments of reply brief; Review Scoffield's cross petition to vacate; Draft stipulation to extend TLA's time to respond.	7.50 hrs.	2,250.00
07/29/2020	KB	Downloading filings.	0.30 hrs.	57.00
07/30/2020	GI	Assist with preparing and SDNY ECF file stipulation.	0.50 hrs.	105.00
07/30/2020	HJK	Emails re: scheduling; telecon with █████; telecons with CR re: research; review brief.	2.50 hrs.	2,750.00
07/30/2020	CR	Draft letter to court re extension; Draft stipulation of extension; Research on █████ ████████████████████	3.50 hrs.	1,050.00
07/30/2020	KB	Saving SDNY filings.	0.20 hrs.	38.00
07/31/2020	GI	Review docket for any recent filings and updates.	0.20 hrs.	42.00
07/31/2020	HJK	Emails; telecon with CR; review research; telecon with ME; telecon with RG; telecon with JF.	2.60 hrs.	2,860.00
07/31/2020	CR	Research █████ ████████████████████ Review cross petition	3.70 hrs.	1,110.00

KAPLAN RICE LLP  
60276 0013 GSE

Invoice# 2972 Page 5

to vacate including MLBPA regs; telecon with H. Kaplan; teleconf with M. Eggenberger re reply brief.

07/31/2020	MKE	Review removal and cross-petition filings; speak with H. Kaplan about response.	3.70 hrs.	1,665.00
			Total Services	\$41,758.00

Detail of Expenses Billed

07/14/2020	Court Fees	350.00
07/20/2020	032, Federal Express; Invoice # 7-069-60868; 7/17/20 Chris Amezquita, 51 Frogmore Road, Mount Pleasant SC 29464	75.96
07/27/2020	032, Federal Express; Invoice # 7-075-88810; 7/22/20 Chris Amexquita, 11717 Darlington Avenue, Los Angeles CA 90049	89.43
07/27/2020	032, Federal Express; Invoice # 7-075-88809; 7/20/20 Meghan Whelan, 1775 Broadway Apt. 7, San Francisco, CA 94109	76.08
07/31/2020	Westlaw Research	92.70
07/31/2020	Court Database	35.30
07/31/2020	Lexis Research	11.82
07/31/2020	Westlaw Research	1,594.23
Total Disbursements		\$2,325.52